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May 28, 2014

ECF

Honorable Denise L. Cote
United States District Judge
500 Pearl Street, Room 1610
New York, NY 10007-1312

MEMO ENDORSED

Re: C.A. No. 1:13-cv-03669-DLC; *River Light V, L.P. and
Tory Burch LLC v. Lin & J International, Inc., Youngran Kim,
LJ Brand, Inc. and NJ Lin & J International, Inc.*

Dear Judge Cote:

I write on behalf of all parties to jointly request a thirty (30) day extension of the expert deadlines in the above-reference matter. The requested extension will not cause delay of any other deadlines in the case, and the parties will still complete all fact depositions by July 25, 2014, as previously requested by the Court.

Under the Court's Pretrial Scheduling Order (Dkt. 19), disclosures and reports of experts for any party bearing the burden on an issue are due May 30, 2014. Rebuttal disclosures and reports of experts are due June 20, 2014. All expert discovery is to be completed by July 25, 2014. The parties jointly request that these deadlines be continued as follows:

- Expert reports and disclosure of expert testimony conforming to the requirements of Rule 26(a)(2)(B), FRCP, by the party bearing the burden on an issue: **June 30, 2014**
- Identification of rebuttal experts and disclosure of their expert testimony: **July 21, 2014**
- Deadline for all expert discovery to be completed: **August 25**

As mentioned above, the parties' requested continuance will not affect any other deadlines, including the September 6 dispositive motion deadline.



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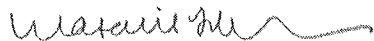
WASHINGTON, DC

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The need for the requested continuance is due to unforeseen circumstances arising from the collection, review and inspection of voluminous data in native format recently collected from Defendants, which has been delayed due to unforeseen circumstances and cannot be completed by the current May 30 deadline.

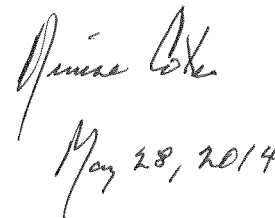
Respectfully submitted,



Natalie L. Arbaugh,
Counsel for Plaintiffs

cc: Howard Z. Myerowitz (via ECF)
Jeremy Doberman (via ECF)
Counsel for Defendants

Granted.



May 28, 2014